

I applied for a service upgrade and after it was approved by the company's engineer, and after I had set up my new electrical equipment to specifications, CIPS backed down from the originally agreed upon arrangement. They refused to hook up my new service without the payment of \$3,100 for a non-residential / temporary charge that they claim applies to my new service.

At first, they told me if I had my new service combined with the current house service, all through one meter, that I would not be charged anything. After I had purchased the new service equipment and set it up according to their specifications, they told me that since part of the load is seasonal, the entire service would be classified as temporary and I would have to pay for the replacement of CIPS' transformer and secondary cables.

Mr. Stephen R. Kaufmann
Post Office Box 5131
Springfield, IL 62705

Request for Documents and Information

Under the 83 Illinois Administrative Code, Ch. III, Subchapter 'b' Section 200.340 'Policy on Discovery' I hereby request all pertinent information that I feel will be relevant to my Formal Complaint hearing with the Illinois Commerce Commission to be mailed to me in a timely manner upon receipt of this request. To be included, but not limited to, are the following:

1. A copy of the entire "Rules and Specifications" manual, that is on file with the commission, and adopted for use by CIPS.
2. Copies of all bill payment records of mine to CIPS.
3. All phone records of calls made into CIPS by my son or myself within the last two years.
4. All complaints, in writing or by phone, made by my son or myself, to CIPS involving any type of problem with electrical service. Included should be:
 - a) Date of the complaint
 - b) Person taking the complaint
 - c) Action taken to correct the problem
 - d) What the problem was
 - e) Date the action was taken
 - f) Person(s) involved in correcting the problem.
5. All complaints made by other customers, directly to CIPS or through the Illinois Commerce Commission, that are similar in nature to the ones made by my son or myself. Included should be:
 - a) Date of the complaint
 - b) Customer making the complaint
 - c) Person taking the complaint
 - d) Action taken to correct the problem
 - e) What the problem was
 - f) Date the action was taken
 - g) Person(s) involved in correcting the problem

6. All complaints made by any customer about any of the employees that were involved in my complaint. Included should be:
 - a) Date of the complaint
 - b) Customer making the complaint
 - c) Person taking the complaint
 - d) Employee complained about
 - e) Action, if any, taken against that employee
7. All policies, rules, and standards of procedure involving dealings between company staff and customers.
8. All information pertaining to CIPS' interpretation of the National Electric Code.

All documents should be organized in a clear easy to follow manner. They should be legible if hand written. They should be marked or labeled as to what they are or what is contained in them. Failure to deliver the above requested items in a reasonable length of time will result in formal discovery actions taken by means of deposition and/or subpoena.

Thank you for your anticipated cooperation,


Penny Shehadeh